

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOE ALVES, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

C.A. No. 1:22-CV-11820-IT

**ASSENTED-TO MOTION FOR ADMISSION *PRO HAC VICE*
OF ATTORNEY SOPHIE L. KLETZIEN**

Pursuant to Local Rule 83.5.3(e) of the United States District Court for the District of Massachusetts, Michael T. Maroney, counsel for Defendant The Goodyear Tire & Rubber Company (“Goodyear”), respectfully requests that this Court enter an Order admitting Sophie L. Kletzien to appear and practice as counsel for Goodyear in this action *pro hac vice*.

In support of this motion, movant states as follows:

1. Ms. Kletzien is an associate in the law firm of Holland & Knight LLP, 31 West 52nd Street, New York, NY 10019.
2. Ms. Kletzien is a member in good standing in every jurisdiction in which she has been admitted to practice.
3. Ms. Kletzien is not the subject of disciplinary proceedings pending in any jurisdiction in which she is a member of the bar.
4. Ms. Kletzien has not previously had a *pro hac vice* admission to this court (or other admission for a limited purpose under this rule) revoked for misconduct.

5. Ms. Kletzien has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.

6. Attached hereto as Exhibit A is a Certification of Sophie L. Kletzien in support of this motion.

WHEREFORE, the undersigned counsel respectfully requests an Order admitting Sophie L. Kletzien to appear and practice as counsel for Goodyear in this action *pro hac vice*.

Respectfully submitted,

THE GOODYEAR TIRE & RUBBER
COMPANY,

By its attorneys,

/s/ Michael T. Maroney
Michael T. Maroney (BBO #653476)
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HOLLAND & KNIGHT LLP
10 St. James Avenue
Boston, MA 02116
(617) 523-2700

Dated: November 16, 2022

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I have conferred with counsel for plaintiff, who assents to the relief requested in this motion.

/s/ Michael T. Maroney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent those indicated as non-registered participants on November 16, 2022.

/s/ Michael T. Maroney